

# INTEGRATIVE THERAPEUTICS INC.



NF Formulas



PhytoPharmica

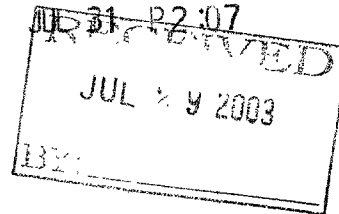


Tyler Encapsulations



Vitaline Formulas

7767 '03



July 24, 2003

Mr. Robert Moore  
Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 811  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740


## Notification of structure-function claims

Dear Sir:

This letter is to notify you that the following product manufactured, packed, and/or distributed by Integrative Therapeutics, Inc. (9725 SW Commerce Circle, Suite A6, Wilsonville, OR 97070) has literature which contains statements provided for by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Integrative Therapeutics, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and complies with section 403(r)(6) of the act.

Product Name	Statement	Ingredient(s) to which claim refers
DigestRight®	"The Learner's Edge® System gives kids the edge they need in today's complex and often unhealthy environment, with support for natural ...digestion...."	Protease Validase Maltase Amylase Lipase Lactase Cellulase Sucrase (Invertase) Phytase

I certify that the information contained in this notice is complete and accurate, and that Integrative Therapeutics, Inc. has substantiation that the statement is truthful and not misleading.

  
Mario Roxas, N.D.  
Director of Scientific and Technical Affairs

Date

7/24/03

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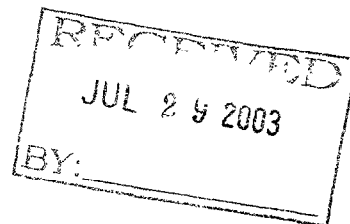
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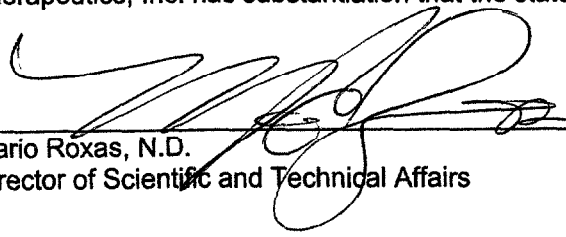
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Product Name	Statement	Ingredient(s) to which claim refers
DigestRight®	"The Learner's Edge® System...it's what every young body needs, and what every parent should know about."	Protease Validase Maltase Amylase Lipase Lactase Cellulase Sucrase (Invertase) Phytase

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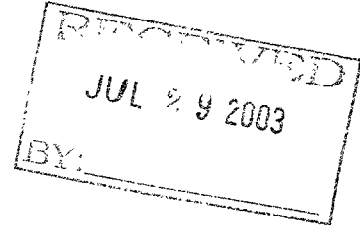
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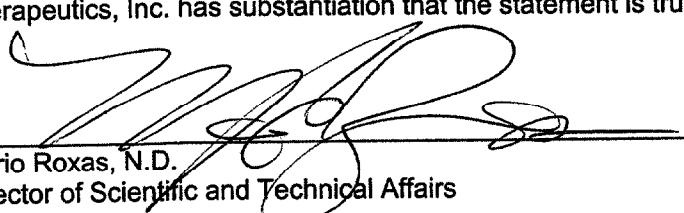
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**Product Name**  
*DigestRight®*

**Statement**  
"This natural support system is the result of years of experience and developed by leading children's medical experts at the International Child Development Resource Center (ICDRC) and specialists in naturopathic therapeutics at Integrative Therapeutics, Inc."\*

**Ingredient(s) to which claim refers**  
Protease  
Validase  
Maltase  
Amylase  
Lipase  
Lactase  
Cellulase  
Sucrase (Invertase)  
Phytase

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Mario Roxas, N.D.  
Director of Scientific and Technical Affairs

Date  7/29/03